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February 20, 1998

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

The Honorable Chairman William Kennard  
The Honorable Susan Ness  
The Honorable Michael Powell  
The Honorable Gloria Tristani  
The Honorable Harold Furchtgott-Roth  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Ex Parte; WT Docket 97-82

Dear Chairman and Commissioners:

We are writing as a group of companies that have been committed to C block buildout and competition for many years. We appreciate that you are devoting considerable attention to reconsideration of the September 1997 C block restructuring order. The September 1997 decision yielded no commercially reasonable solution. It did not enable us to continue to move forward with network buildouts, and with providing resale competition. However, with a few straightforward amendments to that Order, the Commission can ensure that the C block will again be in a position to vigorously compete in offering wireless services to all American consumers, and particularly to those who have yet to benefit from the wireless revolution.

We respectfully request that the Commission amend last September's decision to grant C block licensees full credit of all of their downpayments under each option. Raising the \$1 billion that already has been paid to the government was an extraordinary accomplishment for C block entrepreneurs. No C block licensee has ever defaulted on a payment. That money should be applied against payments due to the government so that capital raised in today's market can immediately be put to work building competitive networks to serve American consumers.

Second, we respectfully request that the Commission restart its payment clock to begin with the adoption of the Commission's reconsideration order. Given the regulatory and marketplace uncertainty of this past year, C block entrepreneurs had virtually no commercial access to licenses and thus financing ability ground to a virtual halt. The "suspension interest" payments now required to be paid in the first two years are a substantial impediment to our ability to obtain the next round of financing for our early years, and to build out networks.

Third, we respectfully request that the Commission grant licensees the flexibility to select on an MTA basis from among the available options. This flexibility is necessary to create sound operational plans in today's market.

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Finally, we respectfully request that the Commission consider offering licensees a buy-out option that results in a commercially reasonable price, by taking into account the favorable government financing terms in the calculation of the cost of capital associated with the exercise of this option.

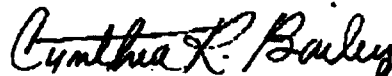
The C block had its birth in the intent of Congress and the FCC that entrepreneurial and small businesses be enabled to bring their unique competitive vitality to the telecommunications marketplace. These entrepreneurs were set back unfairly by the penalties imposed in the C Block Restructuring Order. The solutions suggested here are fair to all, limited in scope, and of benefit to American consumers.

We thank you for your consideration. We wish to assure you that we shall work untiringly to promote competition.

Sincerely,



Bobby Lim  
2001 PCI



Cynthia R. Bailey  
CX Systems International, Inc.



Tracy D. Oldham  
ACRS, Inc.



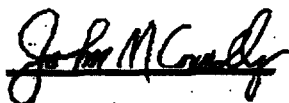
Wendimarie Haven  
Airtel Communications, Inc.



Jeffrey Elkins  
On behalf of CalTech International Telecom



Thomas V. Craft, R.L.S.  
Calvada Surveying, Inc.



John M. Connolly  
CCS



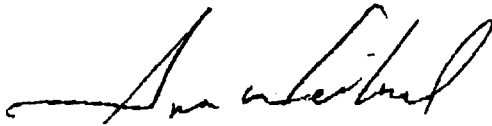
Larry L. Day  
Cellexis International Inc.



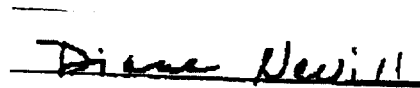
Michael Tricarichi  
CELLNET of Ohio, Inc.



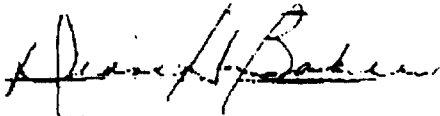
Lonnie Benson  
FOX Communications Corp.



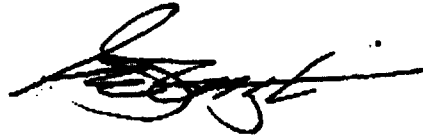
Ana Weiland  
Dot Wireless, Inc.



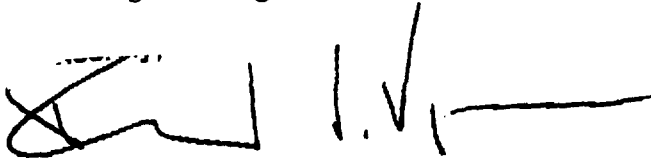
Diane Nevill  
Glendale Public Library



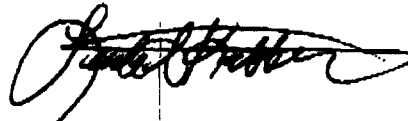
Diane H. Baker  
Dragon Management USA



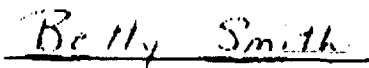
S.G. Kim  
HC Electronics



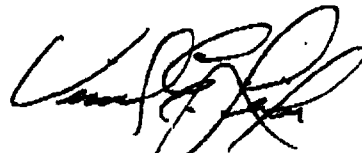
Richard L. Vega, Sr., President  
Duluth PCS, Inc.  
St. Joseph PCS, Inc.  
West Virginia PCS, Inc.



Leah A. Kabbara, P.E.  
Kabbara Engineering



Betty Smith  
FWI Inc.



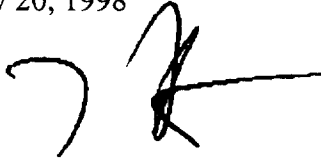
Vince Leifer  
Leifer, Marter & Associates, Architects



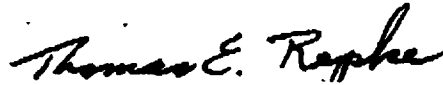
John O'Brien, CEO  
Federal Network



David D. Fernald  
MFRI Inc.



Fred Faulkner, III  
MJA Communications Corp.



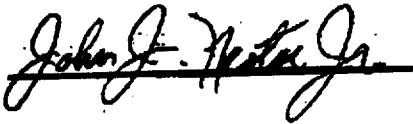
Thomas E. Repke, President  
One Stop Wireless of America, Inc.



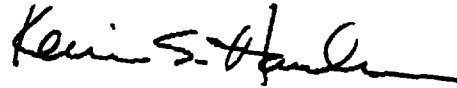
Rhonda McKenzie  
MTG Inc.  
PCS Plus, LLC



Clayburn C. Curtis  
OnQue Communications, Inc.



John J. Nestor, Jr.  
Nestor Construction



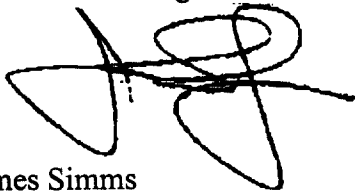
Kevin S. Hamilton  
Prime Matrix Wireless Communications,  
Inc.



George Brennan  
Network Building & Consulting, Inc.



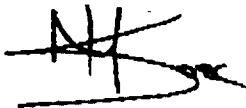
Meilech Friedman  
RFW Inc.



James Simms  
Network Services Inc.



Mike Musulin  
Scottsdale Development & Investment Inc.



Monuj Bose  
New Wave, Inc.

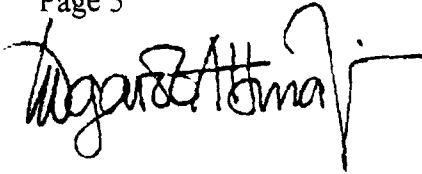


Roy Stewart  
Stewart Electric & Communications

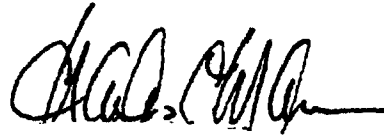
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Jojo Umali  
Structure Consulting Group



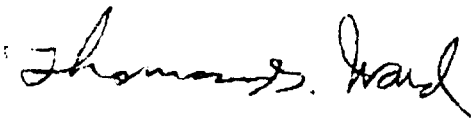
Charles C. Morris  
Warren, Morris & Madison, Ltd.



Xico Salazar  
Sun Surveying



Oye Obe  
Wireless Nation, Inc.



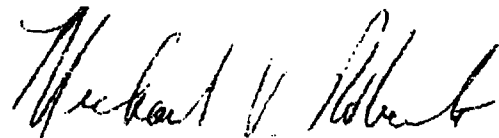
Thomas G. Ward  
Third Kentucky Cellular Corporation



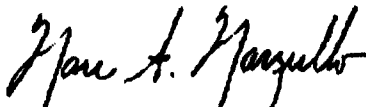
Tim Khayat  
Wireless Ventures, Inc.



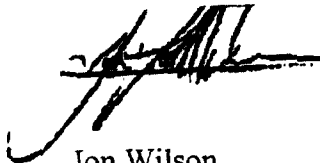
Phillip Van Miller  
UCN Inc.



Michael V. Roberts  
Roberts-Roberts & Associates, LLC



Marc A. Marzullo, PE  
URS Greiner



Jon Wilson  
Unishippers Association



Robert A. Sweetser  
Warren, Morris & Madison, Ltd.